

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

ANNA GONZALEZ and RONALD K.
PAGE, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

STATE FARM LIFE INSURANCE
COMPANY,

Defendant.

Civil Action No. 5:20-cv-00617

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' FIRST AMENDED CONSOLIDATED
CLASS ACTION COMPLAINT AND DEMAND FOR JURY TRIAL**

Defendant State Farm Life Insurance Company respectfully requests an extension of time of 7 days to respond to Plaintiffs' First Amended Consolidated Class Action Complaint and Demand for Jury Trial [Dkt. 72]. **Counsel for Defendant conferred with Plaintiffs' counsel who is unopposed to the relief requested herein.**

1. On March 1, 2021, Plaintiffs filed their Unopposed Motion for Leave to File First Amended Consolidated Class Action Complaint. [Dkt. 71]. The Court docketed Plaintiffs' First Amended Consolidated Class Action Complaint on March 2, 2021. [Dkt. 72].

2. During a phone conference on February 24, 2021, counsel for State Farm advised Plaintiffs' counsel they did not oppose Plaintiffs' Motion for Leave, but that Defendant would request an additional 7 days to respond to Plaintiffs' First Amended Consolidated Class Action Complaint as a professional courtesy.

3. Plaintiffs' counsel advised they do not oppose Defendant's request to enlarge the time for filing a response by 7 days, which would make the new deadline March 23, 2021.

4. The relief requested is for good cause and will not result in undue delay in the administration of this case. Plaintiffs' First Amended Consolidated Class Action Complaint raises complex issues of law. An enlargement of time for filing Defendant's response is necessary to allow Defendant and its counsel time to review and respond to Plaintiffs' new allegations.

5. For these reasons, Defendant respectfully moves that the Court extend the time for responding to Plaintiffs' First Amended Consolidated Class Action Complaint by 7 days, making the deadline March 23, 2021.

Dated: March 3, 2021 Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT
STATE FARM LIFE INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I certify that on March 3, 2021, a true and correct copy of the above and foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ Susan E. Egeland
SUSAN E. EGELAND

CERTIFICATE OF CONFERENCE

This is to certify that on February 24, 2021, the undersigned conferred with Plaintiffs' counsel via phone and email regarding the substance of this Motion. Plaintiffs' counsel consented to Defendant's request to enlarge the time for filing its response to Plaintiffs' First Amended Consolidated Class Action Complaint by 7 days.

/s/ Susan E. Egeland
SUSAN E. EGELAND